

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Early View Academy of Excellence

Agency Code: 40-2712

School(s) Reviewed: Early View Academy of Excellence (grades 4K-12)

Review Date(s): April 4-6, 2017

Date of Exit Conference: April 6, 2017

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Notes:

- The Review Month for Benefit Issuance, Meal Counting and Claiming, and Meal Pattern was cooperatively pre-selected to be March 2017, but the March claim was not prepared for submission, so February 2017 was selected as the Review Month. The February 2017 claims had been submitted.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge; we will be in Milwaukee at Alverno College August 8 - 10. The ServSafe class and exam is offered on August 10, 2017. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Early View Academy of Excellence for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional

information. All seemed open to recommendations and guidance. Thank you for making us feel comfortable.

The staff we worked with and encountered in the hallways were kind and hospitable. The students at Early View Academy of Excellence were respectful to the staff and visitors.

Attractive posters lined the lunch and breakfast serving area. The serving line was efficient and staffed by two passionate cooks serving fresh and hot meals. Students and staff take pride in their beautiful school building, lined with fine artwork.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- All free/reduced applications and the direct certification runs were available for review.
- Thank you for using the DPI prototype letters with the current non-discrimination statement to communicate to households.
- The Point of Service (POS) with the electronic software, Power Lunch in tandem with Power School for the student information system, is performed efficiently. Breakfast POS is done manually and entered into Power Lunch at the end of the day, week or month. A suggestion was given to ease the time spent for this activity.
- Thank you for completing the Edit Check for lunch each month before entering the meals for claim reimbursement.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- Two hundred twenty-eight eligibility determinations were reviewed with 13 errors identified. They are listed as Corrective Action items below and on the revised SFA-1 document, attached.
- Much discussion was spent on the benefits of Community Eligibility Provision (CEP) which would eliminate the application process for meal benefits as well as reduce the verification process for the families.
- Although this school participates as a non-pricing meal program, it is important to complete the benefit issuance process correctly and thoroughly for proper claiming of meals.
- It is very important to finish the verification process of applications in the proper time frame and upload the verification collection report accurately. A Corrective Action finding below speaks to the process requirement to be completed.

Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application. Please enter the date determination took place and the signature of the Determining Official on each application.

- Children are eligible for free or reduced price meal benefits on the date their eligibility is determined by the Determining Official.
- When an application only has one frequency of payment indicated for all of their reported incomes on the application, you should not convert it to annual, but using the Income Eligibility Guidelines (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>) you would look at the amount of their income under the column indicating that frequency (i.e., weekly, twice monthly, every two weeks, monthly, annually).
- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss.

Zero Income

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

Household Size Box

- As a reminder, for the household income size box:
 - If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household members have been included on the application before an eligibility determination is made.
 - If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included which can make a difference in the eligibility determination. Any application which does not have this box completed is considered an incomplete application. This information is being given as technical assistance this year before it becomes required for the 2017-18 School Year.

Incomplete Applications

- Any application that is missing required information, contains inconsistent information or is unclear, is considered an incomplete application and may not be determined until clarified. The SFA may return the application to the household or contact the child's parent or guardian either by phone or in writing, including email. The determining official should document the details of the conversation, date, and initial. Applications missing signatures must be returned to the parent to obtain it before processing.
- Reasonable effort should be made to obtain any missing information prior to denying the application.

Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- Local Education Agency (LEAs) must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.

- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian.
- The FNS website offers the application materials in 49 languages
<http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.

Annual Income

NEW - There has been a recent modification to the requirement pertaining to the reporting of annual income on an application. USDA released SP 19-2017 on March 20, 2017 allowing households to report current income as an *annual figure*. Annual income is typically reported for households with jobs that are seasonal, self-employed, or agricultural work since that is a more accurate representation of *current income*. Until this memo was released it was required that schools *confirm* with the household that the income reported is representative of that type of work. Most households that receive regular pay checks report income based on what is *currently earned* and the frequency of that pay, i.e. weekly, biweekly, bimonthly or monthly. SP 19-2017 removed the requirement for the School Food Authority (SFA) to follow up with the household regarding the validity of annual income prior to making an eligibility determination. These applications may now be processed at face value.

Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

Transferring Students

- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and assists in correct meal status claiming. This applies both during and between school years. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA and process a household meal application within 30 operating days.
- Until July 1, 2019 when this regulation becomes mandatory, we **encourage** the new school to provide free meals and can claim for free meals through the 30th operating day (**or until a new eligibility determination is made, whichever comes first**). In this case, acceptable documentation of eligibility from the former Provision (CEP or P2) LEA can be a copy of the School Year 2016-2017 Wisconsin Schools and Districts Participating in Community Eligibility Provision list highlighting the former school's name. This list is updated annually and is available on the DPI CEP website, such as for this year: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cep-participating-schools-and-districts-1617.pdf>. The Provision schools should include this list in the transferring student's file. For a list of Provision 2 schools, contact the School Nutrition Team office.

Effective Date of Eligibility

- LEAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the official approves the application. This flexibility applies only to complete applications containing all required information and for all applications. See USDA memo SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Please contact the Assistant Director of the School Nutrition Team for more information and approval.

Direct Certification (DC)

- As a reminder, you are required to run direct certification for the entire student population a minimum of three times a year: at or near the beginning of the school year, three months after the initial run (about November) and six months after the initial run (about February). This SFA had run the complete list of students in August and October, and ran a full DC match while we were onsite.
- The effective eligibility date for a DC eligible student is the date of the original output file.

Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.
- Early View Academy of Excellence had a 5.70% certification error rate and will be required to conduct a second review of applications in School Year 2017-18, unless they decide to and are approved for Community Eligibility Provision (CEP). More information on this requirement is found in the Eligibility Manual <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-2016.pdf>. You will also receive a SNT memo in June with more information.

Disclosure

- The information provided by the household on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes and consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

Verification

- When applications are chosen for verification, the person designated as the Confirming Official should be reviewing these applications prior to contacting the family to ensure the initial determination is correct. There is a place for the Confirming Official to sign and date on the back of the application.
- The Verifying Official signs and dates the application when the verification process is completed.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.

- When a benefit eligibility status increases, the change must take place within 3 days. When a benefit eligibility status decreases, the change cannot take place before 10 calendar days and a notice of adverse action must be sent in writing with the appeal rights procedures.

Meal Counting and Claiming

- Meals must be offered to all students each day school is in session a full day, so DPI has posted a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>.
- The meal counting and claim was conducted with only a small entry over-claim error of 10 meals in the Free category for Breakfast. This is cited in a Corrective Action item below.
- A 30 minute POS training on Offer versus Serve is available on the DPI website through this link: <http://media.dpi.wi.gov/school-nutrition/offer-versus-serve/story.html>. This is recommended for all food service staff to watch and discuss, including the classroom teachers who administer the Breakfast in the Classroom option for young students.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

Community Eligibility Provision (CEP)

- This SFA is strongly encouraged to participate in CEP participation for School Year 2017-18. It appears that this SFA would be eligible for 100% free meal claiming, but it is necessary to apply with documentation to DPI by June 30, 2017.
- This DPI webpage contains more information and resources about CEP: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility>.
- The CEP is a 4-year reimbursement option for eligible LEAs and schools participating in both NSLP and SBP that wish to offer free school meals to all children in high poverty schools without collecting household applications.

Findings and Corrective Action Needed

Certification and Benefit Issuance

- ❑ **Finding #1:** Two students (HACA1 and DUMA1) in separate households were determined for Free meals, but the information on the applications was not complete as the household adult did not provide the last 4 digits of the social security number or the indication that they do not have a social security number.

Corrective Action Needed: It was requested on 4/4/17 to contact the households to obtain the required social security number information. Since that was not able to be completed, those households must be advised of the change in status to Denied/Paid. Please change the status in the POS system to Paid so meals for these students will be claimed in the Paid category, and provide a screen shot to show the status change for these students.

- ❑ **Finding #2:** A student (TOJU1) in a household was determined for Free meals, but no application was found nor were the students found on any Direct Certification match, so they are not documented to receive Free meals.

Corrective Action Needed: It was requested on 4/5/17 to secure the applications for this student. Since that was not possible, it is required to change the meal eligibility status for them to Paid for meal claims. Please provide a screen shot from your software to show the status change for these students.

- ❑ **Finding #3:** A student (DACH1) in a household was determined for Free meals inappropriately. There was not sufficient documentation to support that determination, so they must be changed to Paid meal status.

Corrective Action Needed: It was requested on 4/5/17 to secure the documentation to determine the application completely. Since that was not possible, it is required to change the meal eligibility status for them to Paid for meal claims. Please provide a screen shot from your software to show the status change for these students. This student was found on the Direct Certification match run 4/5/17, had their status changed in the POS and is now COMPLETED.

- ❑ **Finding #4:** These four students (SCRE1, SCNY2, SCKE3, and SAAS4) in the same household were determined for Free meals, but the application did not list a valid program case name nor were the students found on the Direct Certification matches on file, so they are not documented to receive Free meals. The application was incomplete to use other income information for determination.

Corrective Action Needed: These students were found on the Direct Certification match run 4/5/17; the corrective action for these four students is COMPLETED 4/5/17.

- ❑ **Finding #5:** These two students (JOEN1 and ALNI2) in the same household were determined for Free meals, but the application did not list a valid program case name nor were the students found on the Direct Certification matches on file, so they are not documented to receive Free meals. The application was incomplete to use other income information for determination.

Corrective Action Needed: Please change these 2 students to Paid and advise the households of the change in status to Paid. Please change the status in the POS system to Paid so meals for these students will be claimed in the Paid category. Send the Adverse Action letter to the household and provide a screen shot from your software to show the status change and appropriate date for these students.

Verification

- ❑ **Finding #6:** The verification process needs to be completed by November 15th, with the results transferred to the Verification Collection Report (VCR). The VCR is required to be completed annually and is due to be entered online by February 1. For the past few years, SNT needed to contact Early View Academy to encourage completion and to upload the report after the deadline had passed. The VCR was completed per a phone conversation in February with the Assistant Director, but was found onsite to be inaccurate.

Corrective Action Needed: Please provide a copy of the correct information for the Verification Collection Report for School Year 2016-17; this was Completed onsite 4/6/17. Please also send a statement of how the Verification process will be completed by November 15 and the VCR will be submitted before February 1.

Meal Counting and Claiming

- **Finding #7:** The meal counts are taken from the Power Lunch software, an edit check completed and the business office checks the work before entering the claim. For the February monthly claims, there was a 10 meal error in the Free category for Breakfast.

Corrective Action Needed: The SFA noted that these 10 breakfast meals were for 2 students who did not show up in the Edit Check counts. If the SFA can supply a print out of the 10 meals to claim, DPI will allow the claim without fiscal action. Otherwise, this will be entered into a Fiscal Action calculator and DPI SNT will report the financial impact in our Closure letter to the SFA. Nothing needs to be submitted to DPI SNT.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Comments/Technical Assistance/Compliance Reminders

It is imperative that food service staff utilize the trainings and resources available to them. The SNT offers a variety of training opportunities throughout the year such as recorded webcasts, live webinars, and in-person classes. Refer to the training webpage at dpi.wi.gov/school-nutrition/training for current and upcoming opportunities. To ensure future success in the program, **Early View Academy of Excellence should plan to send food service staff to the summer classes that will be held in Milwaukee at Alverno College on August 8-10, 2017.** As discussed onsite, food service staff will benefit from courses on meal pattern requirements, culinary math and standardized recipes, Offer versus Serve (OVS), and sodium. Make sure to join us on the second Tuesday of every month at 2:00 p.m. for the *What's New with School Nutrition* webinar to keep current on program regulations. More information can be found at <http://dpi.wi.gov/school-nutrition/training/whats-new>.

Completing daily production records for breakfast and lunch is not a new requirement of the USDA school nutrition programs. Production records must document that food meeting meal pattern requirements was offered and served in the appropriate portion sizes for each grade group in order to support claims for reimbursement. Production records are intended to be useful tools for recording information before production, during production, after production, and after meal service. This information can be used to help forecast the quantities to prepare the next time the same menu is served. Every item offered as part of the reimbursable meal must be recorded on production records, including condiments and milk. Reimbursable field trip meals must also be recorded. As discussed in detail onsite, the menu planner should be responsible for starting the production record by filling in the date, the site name, the grade groups, the planned number of student and adult meals, the menu and all items that will be offered as part of the reimbursable meal, planned portion sizes, planned number of servings for each menu item, and total planned quantity to prepare. Adding in details about how each menu item credits helps to ensure meal pattern requirements have been met. Kitchen staff should be responsible for completing each production record by filling in the actual number of servings prepared, the actual quantity prepared, and the amount leftover at the end of service. Either the menu planner or kitchen staff must also record the actual number of student and adult meals served.

Completed production records must be kept on file for three years plus the current year. These records must be made available to state and federal entities when asked for them during audits and reviews. A production record template for lunch that provides recording space for two different grade groups was discussed onsite. A copy of this template was given to the food service director and technical assistance was provided on filling in production details for lunch on the day of observation. Additional templates and resources can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>. Make sure to refer to the production records “Must Haves” list at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-requirements.pdf> so that all necessary information is being recorded daily. Staff have been advised to watch the short webcast on production records at <http://media.dpi.wi.gov/school-nutrition/final-production-records/story.html> to learn more about why production records are important, what they are required to have, and what strategies can be used to help complete production records.

Use of standardized recipes is another important part of the USDA school nutrition programs and is not a new requirement. **Any menu item that has more than one ingredient must have a standardized recipe.** This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. Standardized recipes help to keep the nutritional value of portion sizes the same, which helps to ensure that the USDA’s dietary specification requirements are met. Many resources exist to help you develop and maintain standardized recipes. Go to <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes> for recipe templates, detailed instructions, helpful checklists, additional tools, and links to quantity recipes that can be used for inspiration. Just like production records, standardized recipes must be kept on file and must be made available to state and federal entities when they are asked for during audits and reviews.

The meal patterns for the School Breakfast Program and National School Lunch Program were updated as part of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010, with many changes to the meal patterns starting July 1, 2012. The updated meal patterns created new grade groups for menu planning purposes: K-5, 6-8, K-8, and 9-12 (with an additional option for K-12 menu planning at breakfast only). Menu planning for lunch using K-2 and 3-12 grade groupings is not valid under these meal pattern requirements. There is no overlap in calorie requirements at lunch for students in grades K-8 and those in grades 9-12. This means that students in grades K-8 cannot receive the same lunch meal pattern as grades 9-12. Additional updates to the lunch meal pattern included the separation of fruits and vegetables into different components and the addition of weekly requirements for five vegetable subgroups (dark green, red/orange, beans/peas, starchy, and other). More information regarding the updated meal pattern for lunch can be found at dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning. More information on the breakfast requirements can be found at <https://dpi.wi.gov/school-nutrition/school-breakfast-program/meal-components> and <https://dpi.wi.gov/school-nutrition/school-breakfast-program/menu-planning>.

Menu planning worksheets are very helpful tools for ensuring that meal pattern requirements are being met at both breakfast and lunch. In particular, the menu planning worksheets for lunch make it easy to plan menus that meet the weekly vegetable subgroup requirements. These tools can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>, under Menu Planning Worksheets.

The updated meal pattern mandated by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 outlined a sodium restriction using three targets to allow for a gradual implementation. The first target was implemented July 1, 2014. The second sodium target will take effect beginning July 1, 2017. There are resources pertaining to sodium posted on the NSLP menu planning webpage at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning>. More information on the second sodium target can also be found in the USDA guidance memo at <https://www.fns.usda.gov/sites/default/files/cn/SP%2015-2017os.pdf>. Schools will be offered some flexibility with the target as described in the memo. To help meet the sodium targets, look for ways to reduce salt while cooking and consider purchasing lower sodium options for canned soup, sauces, and condiments. Another option is to consider using USDA Foods.

All grains crediting toward meal pattern requirements must be whole grain rich, beginning July 1, 2014. Grains that are not whole grain-rich cannot be credited toward the grain component. The terms “wheat” or “made with whole grains” on a product label do not necessarily mean that a product is whole grain-rich. Refer to the USDA’s Whole Grain Resource at www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf for more information on identifying whole grain rich products. This requirement was discussed during the review and a copy of the USDA’s Whole Grain Resource was left with the food service director onsite.

The Food Buying Guide for School Nutrition Programs contains yield and crediting information for many foods offered as part of reimbursable meals. Items that can be found in the Food Buying Guide include raw meats, beans, eggs, fruits, vegetables, and milk. It is important to note that the Food Buying Guide has been updated to reflect changes made with the new meal patterns. The print edition is out of date. For the most accurate information, view or print the Food Buying Guide sections at <http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>. This web page was looked at onsite and examples of using the Food Buying Guide to credit sliced cucumbers and pasta were discussed.

Items that cannot be credited using the Food Buying Guide must have a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) from the manufacturer that clearly shows how the product contributes to meal pattern requirements. Food manufacturers are continually reformulating products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. It is strongly recommended to maintain and organize this information in a manner that is easy to reference and update, such as a binder or file folders divided into categories. These records should be reviewed and updated at least annually and as new products are purchased or substituted. More information regarding crediting documentation can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>.

Leafy greens credit for half the volume served in their fresh form. For example, ½ cup of fresh romaine lettuce would credit as ¼ cup dark green vegetable. The same crediting principle applies to iceberg lettuce and other lettuces even if they are not in the dark green subgroup. If leafy vegetables like spinach are cooked, they can credit as the actual volume served. This was discussed onsite and an appropriate serving size for lettuce was determined prior to lunch service on 4/5/17. Note that technical assistance on how to credit leafy greens was also provided to the current food service director during the 2012-13 menu certification process.

During onsite observation of lunch service, the planned vegetable ran out and another vegetable was substituted. While this did not affect the daily vegetable requirement for lunch, this type of situation has the potential for impacting weekly vegetable subgroup requirements. When substitutions are needed, it is recommended to substitute vegetables from within the same vegetable subgroup. For substitution ideas, refer to the vegetable subgroup table at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>.

No more than half (50%) of the fruit offered over the course of a week can be in the form of juice. This limit applies to both lunch and breakfast. Juice offered must be 100%, undiluted juice. For example, ½ cup fruit pieces (fresh, frozen, or canned in juice/light syrup) could be offered alongside ½ cup 100% juice each day, which would meet the 50% limit. Juice is not required to be offered; the full fruit requirement can be met serving fruit pieces (fresh, frozen, or canned in juice/light syrup). Fresh fruit is recommended whenever possible. Whole, fresh fruit can be cut into slices for younger children to make it easier to eat.

Food service staff would benefit from training on Offer Versus Serve (OVS) requirements for breakfast and for lunch. Many students required prompting at breakfast to take at least ½ cup of fruit and food service staff were unclear about what students in grades 9-12 had to take to make a reimbursable lunch. Resources to assist training on OVS can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#ovs>.

Your school has chosen to not use OVS at lunch for students in grades K4-8. While OVS is not required at lunch for these students, it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS in place, students must be served a minimum of ¾ cup vegetable and ½ cup fruit to create a reimbursable meal. If OVS is implemented, students would then have the option to choose three of the five offered components and would only need to select ½ cup fruit, vegetable, or combination of fruit and vegetable as one of their components to create a reimbursable meal.

It was observed onsite that breakfast service in the K4-1st grade classrooms did not resemble family style service but instead looked like Breakfast in the Classroom. The Breakfast in the Classroom toolkit at http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC_Final-web.pdf contains advice that will help you refine your operation.

Performance-Based Reimbursement

During school year 2012-13, your SFA worked with a Public Health Nutritionist on the SNT to certify menus for the additional 6 cents performance-based reimbursement. Changes were made to the menu used for certification to bring the menu into compliance, including increasing portion sizes of vegetables and reducing calories. These changes were a collaboration between the Public Health Nutritionist and the current food service director. The person who was listed on your 2012-13 school nutrition contract as the food service director and who is now listed as the authorized representative completed an online attestation, agreeing that:

- Documentation submitted for certification is representative of the ongoing meal service within the SFA;
- The minimum required quantities for all meal components are available to students in every serving line;

- All labels and/or manufacturer specifications for food products and ingredients used to prepare school meals indicate zero grams of added *trans* fat per serving; and
- All Pre-K meals are compliant with the current meal patterns for the age/grade group being served.

Furthermore, your SFA attested that the information submitted was true and correct and that you understood that if the State agency determined your SFA to be noncompliant with one or more of the requirements set forth in the attestation, fiscal action would include deactivating the performance-based reimbursement, disallowance of meals, and/or withholding of payment. A continued attestation of meal pattern compliance is submitted annually as part of the annual school nutrition contract renewal process.

Related to systemic, severe non-compliance with meal pattern regulations, the performance-based 6 cent reimbursement will be stopped beginning March 1, 2017. Restarting the performance-based funding will be contingent on successful completion of the corrective action, which includes verification that meal pattern requirements for components, quantities, and dietary specifications have been met. Please be aware that it is not sufficient to only make changes to one week of menus. The changes that need to be made to bring your food service operation into compliance must be long-term, sustainable measures.

The 6 cents will be restarted the first full month we are able to confirm that compliant meals are being served and accurate production records are being kept. Please note that the School Nutrition Team reserves the right to conduct an unannounced visit at any time to observe meal service and document compliance. Continuation of non-compliance will result in additional fiscal action.

Program Payment Withholding

As discussed onsite on April 5, since the March 2017 production records and meal pattern compliance documentation were unavailable and due to the fact that this was also a finding with corrective action required on your last Coordinated Review Effort (CRE), January 2012, and Administrative Reviews and Training (ART) Grant SNT review, March 2009, your agency is placed in withholding and program payments will be held until corrective action is received and approved.

Be reminded that the 60 calendar day claiming rule will apply even if your program is restricted from online claiming due to non-compliance. To submit claims, enter your claim as you would online, but rather than being able to submit electronically, you will need to print the claim and scan and email it to Jacque Jordee at jacqueline.jordee@dpi.wi.gov. Once your School Food Authority has corrective action for these non-compliance areas completed and approved by DPI, you will be removed from claims withholding.

Findings and Corrective Action Needed

❑ Finding #8: Review of one week of menus to determine compliance with meal pattern regulations was not possible. As part of the Administrative Review process, reviewed schools are advised to select one full five-day week from the identified review month. This is the week that is reviewed in detail for compliance with meal pattern regulations. Schools are advised to submit all required documentation for the selected review week prior to the onsite review. A list of required documentation was sent to the food service director and authorized representative on 2/23/17 with instructions on selecting a review week from the review month of March 2017. A follow up email

was sent 3/16/17 to the food service director and authorized representative with a reminder about the list of needed documentation. March menus for breakfast and lunch were emailed by the authorized representative on 3/21/17 with the chosen review week of 3/6/17 – 3/10/17 indicated. No other materials were submitted ahead of the onsite review. Per an email from the food service director on 4/3/17, materials would be ready for review onsite on 4/5/17. However, no materials documenting meal pattern compliance for the chosen review week were presented onsite. An expanded review of the month of March showed that there were no production records for breakfast or lunch for March 2017. It was not possible to determine whether daily and weekly component requirements were met, if weekly vegetable subgroup requirements were met, or if reimbursable meals were planned and served.

Corrective Action Needed: It was discussed onsite that a future week must be selected for review and all materials documenting meal pattern compliance for that week must be sent to the Public Health Nutritionist assigned to the review. The food service director selected the week of April 24, 2017. The planned menus for breakfast and lunch for that week were discussed. After the week has been served, completed production records for breakfast and lunch must be submitted along with labels and nutrition information for every item offered (including milk and condiments), standardized recipes for all menu items consisting of two more ingredients combined in-house (make sure to include recipes for cooked vegetables) and crediting documentation for all menu items that cannot be credited using the Food Buying Guide.

❑ **Finding #9:** Production records pulled for school years 2016-17, 2015-16, 2014-15, and 2013-14 show extensive issues with incomplete and missing production records. Previous reviews conducted by the School Nutrition Team also identified issues with missing and/or incomplete production records.

Corrective Action Needed: Fiscal action will be required. The extent of the fiscal action is pending determination. You are required to submit a written statement describing in detail why missing and incomplete production records continue to be a problem for your SFA and the exact steps that will be taken immediately to ensure daily production records are being completed in an accurate manner and are being kept on file. Be sure to identify the person or persons that will be responsible for maintaining these records.

❑ **Finding #10:** Onsite observation of meal preparation, meal service, and food storage areas did not support a low-risk result on the Dietary Specifications Assessment Tool. Due to a high risk result for the onsite portion of this tool and other systemic issues identified that resulted in stopping the performance based reimbursement for lunch, a formal nutrient analysis is required on one week of menus for breakfast and lunch.

Corrective Action Needed: A nutrient analysis will be conducted on the week of menus submitted as corrective action as described in finding #1 above. Any component issues identified with the corrective action week must be fixed prior to the nutrient analysis. If the nutrient analysis results do not meet dietary specification requirements, additional corrective action will be required. A separate report will be provided upon completion of the analysis and any corrective action required will be discussed at that time.

❑ **Finding #11:** Many non-whole grain-rich products are being used to meet the grain requirement. Non-whole grain-rich products observed onsite included Fruit Whirls cereal, several varieties of pasta, garlic bread, and corn dogs. Non-whole grain-rich Hot Pockets were observed in the freezer.

Corrective Action Needed: Replace the non-whole grain-rich foods with whole grain-rich products in order to credit items toward the grains component. Submit a written statement confirming that whole grain-rich foods are being used. This will be validated with product labels submitted for the future review week of April 24, 2017.

❑ **Finding #12:** A standardized recipe for the meat sauce served on 4/5/17 with spaghetti was not used and there was no recipe available for review. The meat sauce was credited based on the amount of meat prepared and the planned number of servings. A serving was determined to credit as 1.75 oz eq meat/meat alternate. While this meets the daily requirement for students in K-8, it does not meet the daily requirement for students in grades 9-12. This was corrected prior to lunch service by adding a cheese cup for 9-12th grade students only. It was noted in a previous review conducted by the SNT that standardized recipes were not being used and that this led to shortages, particularly of meat/meat alternates. Part of the corrective action from that finding was submitting a standardized recipe for spaghetti with meat sauce.

Corrective Action Needed: Submit a standardized recipe for the meat sauce that is used with spaghetti along with a written statement detailing what steps have been taken to train staff on using standardized recipes. Describe why this continues to be a finding at your school and what will be done moving forward to ensure compliance with federal regulations.

❑ **Finding #13:** A milk variety was not offered in the K4 – 1st grade classrooms at breakfast. Students only had access to 1% white milk. As a reminder, a variety of milk is required to be offered daily, for both breakfast and lunch. Offering a variety of milk means offering at least two allowable milk types. The milk types currently allowable in Child Nutrition Programs are nonfat unflavored milk, nonfat flavored milk, and 1% unflavored milk.

Corrective Action Needed: Submit a written statement confirming that students in the K4-1 classrooms have access to a milk variety. Include the date of the first day a milk variety was available to these students at breakfast.

❑ **Finding #14:** It is required to post signage visible to the students that indicates what the offered components in each meal are and what they must select in order for their meal to count as reimbursable. It was observed onsite that signage was posted but was not filled in. Make sure write in each day's menu on the breakfast and lunch posters in the appropriate categories. Consider posting additional signage in the service line that further clarifies options.

Corrective Action Needed: Submit a written statement confirming that the signage templates that are posted in the cafeteria will be updated daily and submit a picture of one day's breakfast and lunch signage from the corrective action week of April 24, 2017.

❑ **Finding #15:** Technical assistance was provided onsite for the field trip meals that were packed for 9-12 students and served on 4/5/17. Resources to help with field trip meals can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#fieldtrip>.

Technical assistance was needed to ensure that full components of fruits and vegetables were packed in the field trip meal bags.

Corrective Action Needed: Submit a written statement that describes how component requirements will be met moving forward for field trip meals.

GENERAL PROGRAM COMPLIANCE

Comments/Technical Assistance/Compliance Reminders

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalizes science-based nutrition guidelines for competitive foods sold on the school campus during the school day. All foods and beverages sold to students on the school campus during the school day must adhere to the Smart Snacks regulations, or must qualify for a fundraiser exemption. More information on Smart Snacks regulations can be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>. To determine if products are Smart Snacks compliant, utilize the Alliance for a Healthier Generation's Smart Snacks calculator at https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/. Remember that products may be compliant for one grade group but not another. It is recommended to print out the calculator results and keep them on file. Refer to the Smart Snacks "In a Nutshell" handout at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf> for more information. Additional information can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

The DPI allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times. The Smart Snacks standards represent the minimum standards and the exemption policy represents the maximum exemptions allowed; school food authorities (SFAs) have the discretion to establish additional restrictions on competitive foods and further limit fundraiser exemptions through their Local School Wellness Policy if they are consistent with federal requirements. All compliant and exempt fundraisers need to be tracked.

To track compliant fundraisers, consider using the template at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/compliant-fundraiser-tracking-tool.xlsx>.

For exempt fundraisers, consider using the template at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/exempt-fundraiser-tracking-tool.xlsx>.

Many schools are successfully implementing healthy fundraisers and creative non-food fundraisers. For ideas, check out <https://cspinet.org/sites/default/files/attachment/school-fundraiser-factsheet.pdf> and <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/healthy-fundraising-ideas-flyer.pdf>.

Findings and Corrective Action Needed

❑ **Finding #16:** A variety of fundraisers are held during the school day, typically after 2:30pm. Items sold during fundraisers include nachos, hot dogs, pizza, chips, Gatorade, soda, Capri Sun, Rice Krispies treats, fruit, fruit roll ups, popcorn and baked chips.

Corrective Action Needed: Submit a written statement that describes how compliant and exempt fundraisers will be tracked and who will be responsible.

3. RESOURCE MANAGEMENT

Commendations

- The business office uses one documented source as a financial account but separates the food service transactions appropriately. Invoices were checked and the process of approving an invoice to the accounting trail were handled well.
- A check was done of the annual revenues and expenses for school year 2016-17 and all was appropriate, including the fund transfer to balance the food service account.
- This SFA is non-pricing so they are not required to have the Unpaid Meal Charge Policy or complete the Paid Lunch Equity (PLE) tool.
- This SFA does not sell anything to students as Non-program foods, so is not required to complete the Non-program Food Revenue tool. They have an exemption for selling only adult meals and an occasional milk A la Carte.

Comments/Technical Assistance/Compliance Reminders

- This SFA is encouraged to participate in securing USDA Foods (commodities) through an entitlement value to obtain foods to use in menu planning according to the meal pattern requirements. A quick calculation from School Year 2015-16 would have provided approximately \$8400.00 in entitlement dollars value. You may find more information on this DPI webpage: <https://dpi.wi.gov/school-nutrition/usda>.

Nonprofit School Food Service Account

- The SFA's Child Nutrition program report provides a compilation of meals claimed, the reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch, breakfast or other programs. The Aids Register tracks all program deposits made to the SFA's account and the amount deducted from the reimbursement to pay for shipping, handling and processing costs of USDA Foods. These may be found on our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.

Annual Financial Report:

- All revenues including reimbursements, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.

- The ending balance on June 30 can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00. Thank you for adhering to this requirement.
- When tracking revenues and expenditures, please keep in mind:
 - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
 - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
 - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
 - Under “A la Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel. The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.

Indirect Costs

- DPI does not allow the annual assigned indirect cost rate to be applied to the food service fund. For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Allowable Expenditures assessed to the food service fund must be supported with documentation.

4. GENERAL PROGRAM COMPLIANCE

Commendations

- The students all receive meals in an appropriate manner with no discrimination in the meal programs. This SFA is non-pricing, but students participating in meals are entered into the POS software system for proper claiming.
- We provided the correct and current “And Justice for All” poster, which was posted in public view. Please remove all of the previous posters which were red, white and blue.
- Civil rights training had been attended by all food service staff with documentation of a signed log available for review.
- The current Public Release was sent to local community outreach organizations. Please also send to a local newspaper annually, as required in a Corrective Action item below.
- Thank you for having water available to students during the meal periods.

- The Employee Health Reporting Agreement was reviewed, signed and kept on file. This is completed annually.
- The Food Safety Plan was available for review and contained most of the required sections. Please add a Standard Operating Procedure (SOP) for Field Trips and Breakfast in the Classroom available at your school. Also complete a list of the foods identified as Process 1, 2 or 3 items.
- The Food Safety inspection reports from the county Health Department were posted in a visible site.
- The kitchen staff and other food service helpers are knowledgeable about foodservice practices and use good food handling practices. All temperature logs were up to date.
- The on-site food storage areas were reviewed, including freezers, refrigerators and dry good storage area.
- Thank you for providing breakfast information and promotion to families before school starts and through School Messenger.

Comments/Technical Assistance/Compliance Reminders:

Civil Rights

- Please remove all old versions of the “And Justice For All” posters, which are the red, white and blue posters in several places.

Nondiscrimination Statement

- When including the nondiscrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on printed menus, only this abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document. Please correct your menu to include the correct statement.

Special Dietary Needs

- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.
- All food substitutions made outside of the meal pattern requirements must be supported by a signed medical statement from a licensed medical professional. You may use the prototype Medical Statement for Special Dietary Needs posted on our website which is also available in Spanish and Hmong: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>.

Processes for complaints

- All SFAs should have procedures (written procedures preferred) for receiving and processing any complaints alleging discrimination within the National School Lunch Program and School Breakfast Program. An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must

provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on the DPI SNT website at https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf.

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days.

Local Wellness Policy Summary for Administrative Review

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 with full compliance of the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and the process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment (every 3 years) results available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.pdf>. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Professional Standards

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management.
- The hiring standards for SFA directors are based on the size of their SFA and includes education, school nutrition experience and food safety training requirements
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-hiring-chart-by-district-size.pdf>.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
- **Annual Training Requirements for All Staff** - If hired January 1 or later, only ½ of the training hours are required during the first school year (SY) of employment.

Directors	Managers	Full Time Staff	Part Time Staff
		(20 hrs or more/week)	(less than 20 hrs/week)
2015-16 SY	2015-16 SY	2015-16 SY	2015-16 SY
8 hours	6 hours	4 hours	4 hours
2016-17 SY	2016-17 SY	2016-17 SY	2016-17 SY
12 hours	10 hours	6 hours	4 hours

Food Safety, Storage and Buy American

Food Safety Plans

- All schools must have a comprehensive site-specific food safety plan on site which includes all process 1, 2, and 3 items, all standard operating procedures (SOP), all equipment, and food service staff and be reviewed yearly. Updated prototype food safety plan templates and SOPs may be found at our website under <http://dpi.wi.gov/school-nutrition/food-safety>
- SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This

means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, kiosks, classrooms, or other locations outside the cafeteria, as applicable.

- It was cited on the latest Food Inspection Report that the school needs to have a certified food manager at this establishment, with a corrective action date of May 3, 2017. Please contact DPI for assistance in finding a class, if needed.
- The USDA FNS Office of Food Safety is excited to share a new educational resource for school nutrition professionals. *A Flash of Food Safety* is an educational video series designed to help busy school nutrition professionals understand and practically apply safe food practices. The videos, available in English and Spanish, address five food safety topics: *Handwashing: Why to Wash Your Hands*, *Handwashing: How to Wash Your Hands*, *Calibrating a Thermometer: Ice Water Method*, *Calibrating a Thermometer: Boiling Water Method*, and *Active Cooling with a Chill Stick*.

Each “flash” video is 2-4 minutes long and can be accessed online via YouTube. They are easy to view from a desktop, laptop, tablet or smart phone – perfect for onsite training! Individuals can earn 15 minutes (1/4 hour) of continuing education for [Professional Standards](#) when they watch all five videos in the series. A certificate of completion is available through the USDA FNS Office of Food Safety website. To view *A Flash of Food Safety*, please visit www.fns.usda.gov/ofs/food-safety-flashes

Time as Public Health Control

- When using “Time as a Public Health (Temperature) Control”:
 - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
 - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
 - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
 - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all leftover TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

Buy American

- The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above (“non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

Reporting and Recordkeeping

- There are many required USDA and DPI reports which must be submitted or maintained in the SFA files and kept for a minimum of the current school year, plus three years after the final claim is submitted for the fiscal year to which they pertain.

SBP and SFSP Outreach

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.
- Please reach out to families throughout the year to promote School Breakfast participation.
- There are resources including School Breakfast Menus on the DPI website: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/school-breakfast-menus-on-the-web.pdf>.

Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Early View Academy of Excellence, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
 - Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
 - Promotion of the USDA Summer Food website <http://www.fns.usda.gov/summerfoodrocks>.

- As part of the National School Lunch Program, it is required to do SFSP outreach. The purpose is to inform your students and families of the free feeding site(s) they may have access to in the summer while school is out of session. Near the end of this school year, it is as simple as a blurb in a newsletter sent home to students, or putting up free posters and/or mail these items free of charge. To access an inclusive map of all potential participating sites in your area, see the interactive map on the SFSP website <http://www.fns.usda.gov/capacitybuilder>.

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD

Summer Food Service Program Coordinator

Phone: 608.266.7124

e-mail: amy.kolano@dpi.wi.gov

Findings and Corrective Action Needed

- ☐ **Finding #16:** Civil rights training must be conducted on a yearly basis for all staff and volunteers who administer any portion of a school nutrition program. Please include the business office and classroom teachers administering the breakfast program.

Corrective Action Needed: Please have the business director and classroom teachers administering breakfast complete this training and sign the attendance log. Submit or scan the attendance log to the consultant.

- ☐ **Finding #17:** The Civil Rights Self-Evaluation Compliance form (PI-1441) is required to be completed by October 31 annually. This was not available for review.

Corrective Action Needed: Please complete this form, submit it and a statement of how this will be completed in a timely manner for the future to the consultant.

- ☐ **Finding #18:** All School Food Authorities (SFAs) are required to distribute a *Public Release* before the start of the school year. SFAs should send the public release to media and grassroots organizations. SFAs are not required to pay to have it published but must maintain documentation of whom the release was sent to along with the specific materials distributed. Early View Academy of Excellence submitted the Public Release statement to several community organizations, but did not submit to a media outlet for School Year 2016-17.

Corrective Action Needed: Please submit a statement of how this requirement will be completed in the future to the consultant.

- ☐ **Finding #19:** The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 with full compliance of the requirements of the final rule by June 30, 2017. There was a request in advance of the onsite visit to have the Local Wellness Policy (LWP) available for review, then asked for while onsite with no documentation provided. Please see LWP requirements in the section above.

Corrective Action Needed: Please complete the Local Wellness Policy (LWP) and submit a copy and any committee evaluations or community notification portions to the consultant.

- ❑ **Finding #20:** SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). This SFA is providing some training to staff but outside of the Civil Rights training attendance log and employee health reporting agreement do not have documentation or a tracking document to show the continuing education hours.

Corrective Action Needed: Please establish a continuing education training hour tracker, such as this Excel template <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/training-tracking-tool-dpi.xls>, and submit a copy to the consultant plus a statement of how the training hours will be completed before June 30 each year.

- ❑ **Finding #21:** The Food Safety Plan was available for review which includes kitchen equipment and a facility description. Please complete the section indicating Process 1, 2, or 3 foods used in your menu planning documentation.

Corrective Action Needed: Please document the foods used in the meal pattern as Process 1, 2, or 3 and submit a copy of that document.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

